

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JANE DOE,

Plaintiff,

CIVIL ACTION FILE NO.:

v.

1:20-CV-02817-ELR

MOREHOUSE SCHOOL OF  
MEDICINE, DR. VALERIE  
MONTGOMERY RICE, DR. NGOZI  
ANACHEBE, MARLA THOMPSON,  
AND JOHN DOES 1-25.

Defendants.

**MOTION FOR EXTENSION OF TIME TO ANSWER  
OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Come now Defendants Morehouse School of Medicine, Dr. Valerie Montgomery Rice, Dr. Ngozi Anachebe, and Marla Thompson (hereinafter “Defendants”), by and through its counsel of record, and pursuant to Fed. R. Civ. P. 6(b)(1), hereby files their Motion for Extension of Time to File Answer or Otherwise Respond to Plaintiff’s Complaint, and respectfully shows the court the following:

1. On or about July 6, 2020, Plaintiff Jane Doe ("Plaintiff") filed her Complaint, (Doc. No. 1), and incorporated exhibits.

2. Defendants were served on October 5, 2020. By court order, Defendants’ response to the Complaint is currently due on or before Friday, December 4, 2020.

3. Counsel has been working diligently to complete the response, however, due to unforeseen personal emergencies over the last couple weeks and work-related commitments, counsel may require additional time to finalize and obtain approval of Defendants' response to the allegations in the Complaint. Therefore, Defendants respectfully request a two-week extension of time (or until Friday, December 18, 2020) to file their response to Plaintiff's complaint.

4. On November 30, 2020, Defendants' counsel contacted counsel for Plaintiff concerning this request, who does not oppose this Motion. This extension of time is requested in good faith to ensure adequate time to address the allegations in the Complaint, is not requested for the purpose of delay, and will not prejudice any party to this action.

5. Given the nature of this motion, Defendants' request that they be relieved of the requirement to submit a supporting memorandum.

WHEREFORE, premises considered, Defendants Morehouse School of Medicine, Dr. Valerie Montgomery Rice, Dr. Ngozi Anachebe, and Marla Thompson respectfully request that the Court enter an Order:

- 1) granting Defendants' Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint;
- 2) provide Defendants additional time through and including, Friday, December 18, 2020, to respond to the Complaint; and,

3) award Defendants such other and further relief as the court deems appropriate under the circumstances.

Respectfully submitted on this the 30th day of November, 2020.

By:

/s/ Tanisha Pinkins  
TANISHA PINKINS  
GA Bar No. 686450  
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*Attorney for Morehouse School of Medicine,  
Inc., Dr. Valerie Montgomery Rice, Dr.  
Ngozi Anachebe, and Marla Thompson*

**CERTIFICATION OF FONT**

I hereby certify that the foregoing document has been prepared in 14-point Times New Roman font and complies with Local Rule 5.1(C), NDGA.

This 30th day of November, 2020.

/s/ Tanisha Pinkins  
TANISHA PINKINS

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing *Motion for Extension of Time to Respond to Complaint* with the Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

This 30th day of November, 2020.

BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.

/s/ Tanisha Pinkins  
TANISHA PINKINS  
GA Bar No. 686450

*Attorney for Morehouse School of Medicine,  
Inc., Dr. Valerie Montgomery Rice, Dr.  
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